

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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FOTINEE FARAH ZAKI, )  
Plaintiff, )  
v. ) C.A. No. 04CV10705RWZ  
UNITED STATES OF AMERICA, )  
Defendant. )  
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)

**JOINT PROPOSED PRETRIAL SCHEDULE UNDER LOCAL RULE 16.1(D)**

The parties to the above-captioned matter hereby propose the following pretrial schedule:

**1. AUTOMATIC DISCOVERY**

All discovery exchanges required by F.R.C.P. 26 (A)(1) and Local Rule 26.2(A) shall be completed by August 25, 2004.

**2. AMENDMENTS TO PLEADINGS**

All motions to amend the pleadings or to join additional parties or claims under any applicable rule shall be made on or before April 4, 2005.

**3. FACT DISCOVERY**

**A. Written Discovery**

All written discovery, including document requests, interrogatories, depositions on written questions, and requests for admissions, shall be completed by December 17, 2004.

**B. Oral Depositions**

All non-expert oral depositions shall be completed by March 18, 2005.

4. EXPERT DISCOVERY

A. Initial Disclosure

Plaintiff shall make the initial disclosure of expert materials required by F.R.Civ. P. 26(A)(2) by April 18, 2005, and Defendant by May 22, 2005.

B. Further Discovery

Further discovery concerning expert witnesses pursuant to Fed. R. Civ. P. 26(b)(4), including interrogatories and depositions, shall be completed by June 27, 2005.

5. DISPOSITIVE MOTIONS

All dispositive motions under F.R. Civ. P. 12 or 56 shall be made before July 30, 2005.

6. FINAL PRETRIAL CONFERENCE

The parties request that the final pretrial conference be scheduled after all dispositive motions are heard.

7. CONSENT TO TRIAL BY MAGISTRATE

The parties do not consent to trial by a United States Magistrate Judge at this time.

Counsel hereby certify that they have conferred with their respective clients with respect to budgeting for costs of litigation and consideration of alternative dispute resolution under the provisions of Local Rule 16.1(D)(3).

Plaintiff,  
By their attorneys,

Defendant,  
By its attorney,

Michael J. Sullivan

UNITED STATES ATTORNEY

/s/ Daniel E. Doherty  
Daniel E. Doherty, Esq.  
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By: /s/ Gina Y. Walcott-Torres  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a true copy  
of this document to the following counsel of record:

Daniel E. Doherty, Esq.  
One Elm Street  
Braintree, MA 02184

Date: August 10, 2004

/s/ Gina Y. Walcott-Torres  
Gina Y. Walcott-Torres  
Assistant U.S. Attorney